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UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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MIAMI DIVISION

CASE NO. 00-6022-CIV-LENARD

Magistrate Judge Turnoff

HENRY NARANJO and
MARLENE RAMIREZ,

Plaintiffs,

v.

STEPHEN BYRON SMITH, PALMER
JOHNSON EXPORT SALES, INC.,
PALMER JOHNSON DISTRIBUTORS,
INC., and PALMER JOHNSON, INC.

Defendants.

**MOTION FOR EXTENSION OF TIME
FOR DEFENDANT PALMER
JOHNSON, INC. TO RESPOND TO
PLAINTIFFS' REQUEST FOR
PRODUCTION**

COMES NOW, the Defendant PALMER JOHNSON, INC., and files this its Motion for Extension of Time to Respond to Plaintiffs' Respond to Request for Production, and as grounds therefor would say as follows:

1. That on or about November 1, 2000, the Plaintiffs propounded discovery to Defendant PALMER JOHNSON, INC.
2. That the responses are due on or before December 6, 2000.
3. That the extent and detail of the discovery solicited by the Plaintiffs requires that the Defendant PALMER JOHNSON, INC. requests an additional thirty (30) days within which to adequately and fully respond to the aforementioned Request for Production.
4. That this Motion is made for good cause as shown above and not for purposes of

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delay.

WHEREFORE, the Defendant PALMER JOHNSON, INC., respectfully requests that the Court enter an Order granting this Motion and permitting it to file its reply up to and including January 5, 2001.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a true and correct copy of the foregoing was furnished by mail on the 4 day of December 2000 to: Manuel Valdes, Esq., Rivkind & Pedraza, P.A., 66 W. Flagler St., Suite 600, Miami, FL 33130; F. David Famulari, Esq., Underwood, Karcher & Karcher, P.A., 2900 SW 28th Terrace, 6th Floor, Miami, FL 33133; and John D. Kallen, Esq., Badiak, Will & Kallen, 17071 W. Dixie Hwy., N. Miami Beach, FL 33160.

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By: 
FRANK J. SIOLI
Fla. Bar No. 9652